

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS  
LIABILITY LITIGATION

MDL No. 2419  
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

*BARGER ET AL. V AMERIDOSE, LLC ET AL*  
1:13-cv-12619-RWZ

**MOTION FOR SUBSTITUTION OF PARTY PURSUANT TO RULE 25(a)(1)**

COMES NOW counsel for Plaintiff John E. Jones, now deceased, and pursuant to Fed. R. Civ. P. 25(a)(1), respectfully moves to substitute Regena F. Jones, the personal representative and duly appointed Executrix of the Estate of John E. Jones, as a named party in place of John E. Jones, deceased. Plaintiff's counsel would show that Plaintiff John E. Jones, died on or about September 26, 2015. On January, 12, 2016, the Probate Court for Dickson County, Tennessee, entered an order appointing Regena F. Jones as the personal representative and Executrix of the estate of John E. Jones, deceased.

On January 27, 2016, counsel for Plaintiff John E. Jones, filed a Suggestion of Death in the individual docket for the above referenced case. [Dkt. 66].

Pursuant to L.R 7.1 (2) Counsel for Plaintiff John E. Jones certifies that he contacted opposing counsel in good faith to resolve the narrow issue presented in the motion. By e-mail dated January 19, 2019 counsel for Tennessee Clinic Defendants, by and through Chris Tardio, responded that they have no objection to the motion. Counsel for the Saint Thomas Entities has not responded to the undersigned's e-mail dated January 19, 2016 regarding their position.

WHEREFORE, for the reasons set forth above, Plaintiff's counsel respectfully moves the Court for an order permitting the substitution of Regena Jones, as personal representative and Executrix for the Estate of John E. Jones as a named party in place of John E. Jones.

Dated: March 23, 2016

Respectfully submitted,

ENGLISH, LUCAS, PRIEST & OWSLEY, LLP

/s/ Robert A. Young

Robert A. Young

/s/ J. Kyle Roby

J. Kyle Roby

1101 College St.

P.O. Box 770

Bowling Green, KY 42102

Telephone: (270) 781-6500

Facsimile: (270) 782-7782

[byoung@elpolaw.com](mailto:byoung@elpolaw.com)

[kroby@elpolaw.com](mailto:kroby@elpolaw.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certified the foregoing was filed with the Court on March 23, 2016 through the Court's CM/ECF system, which will serve all counsel of record.

/s/ Robert A. Young

Robert A. Young